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Attorneys for Plaintiff and Counterclaim Defendant  
SANDISK CORPORATION

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

SANDISK CORPORATION,  
  
Plaintiff and Counterclaim Defendant,  
  
vs.  
  
ROUND ROCK RESEARCH LLC,  
  
Defendant and Counterclaim Plaintiff.

Case No. 3:11-cv-05243-RS

**DECLARATION OF RON MALTIEL  
IN SUPPORT OF SANDISK'S  
MOTION FOR SUMMARY  
JUDGMENT**

Date: April 25, 2014  
Time: 1:30 p.m.  
Judge: Hon. Richard Seeborg

1 I, Ron Maltiel, hereby declare as follows:

2 1. I have been retained in this litigation on behalf of Plaintiff and Counterclaim  
3 Defendant SanDisk Corporation (“SanDisk”).

4 2. I have been asked to provide expert testimony in this litigation regarding U.S. Patent  
5 Nos. 6,570,791 (“the ’791 patent”); 5,682,345 (“the ’345 patent”); 6,845,053 (“the ’053 patent”);  
6 and 6,383,839 (“the ’839 patent”) (collectively, “Patents-In-Suit”); and other patents which are no  
7 longer asserted against SanDisk by Round Rock Research LLC (“Round Rock”).

8 3. I am being compensated at a rate of \$440 per hour for my professional services in this  
9 case. I am also being reimbursed for reasonable and customary expenses associated with my work  
10 and testimony in this case. No portion of my compensation is dependent or otherwise contingent  
11 upon the results of this lawsuit or the specifics of my testimony.

12 4. Attached as Exhibit A is a true and correct copy of excerpts of a report I submitted in  
13 this case on December 13, 2013, entitled “Expert Report of Ron Maltiel Regarding Invalidity of the  
14 Asserted Claims of U.S. Patent Nos. 5,286,344; 5,682,345; 5,783,282; 6,015,760; 6,383,839;  
15 6,570,791; and 6,845,053 (“Invalidity Report”). The excerpts contain my analysis concerning the  
16 ’791 patent. Also included in Exhibit A is a true and correct copy of Appendix C-1 that was  
17 submitted as part of my Invalidity Report, which maps the asserted claims of the ’791 patent to U.S.  
18 Patent No. 6,324,602 to Chen (“Chen”). The contents of Exhibit A accurately reflect my opinions in  
19 this case regarding background information and the anticipation of asserted claim 14 of the ’791  
20 patent by Chen.

21 5. Attached as Exhibit B is a true and correct copy of excerpts of a report I submitted in  
22 this case on January 14, 2014, entitled “Rebuttal Expert Report of Ron Maltiel Regarding the  
23 Asserted Claims of U.S. Patent Nos. 5,286,345; 6,570,791; 6,845,053; 5,286,344; 6,015,760;  
24 5,783,282; and 6,383,839.” The contents of Exhibit B accurately reflect my opinions in this case  
25 regarding background information and the ’345 and ’839 patents.

26 6. Attached as Exhibit C is a true and correct copy of excerpts of a report I submitted in  
27 this case on January 30, 2014, entitled “Reply Expert Report of Ron Maltiel Regarding U.S. Patent  
28 Nos. 5,682,345; 6,383,839; 6,570,791; and 6,845,053.” The contents of Exhibit C accurately reflect

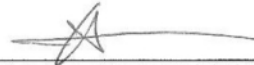
1 my opinions in this case regarding background information and the anticipation of asserted claim 14  
2 of the '791 patent by Chen.

3 7. Attached as Exhibit D is a true and correct copy of my CV, which I provided along  
4 with my expert reports. The contents of Exhibit D accurately reflect my background and  
5 qualifications.

6 I declare under penalty of perjury under the laws of the United States of America that, to the  
7 best of my knowledge and belief, the foregoing is true and correct.

8 Executed on March 13, 2013, in Saratoga, California.

9  
10 By: \_\_\_\_\_



Ron Maltiel